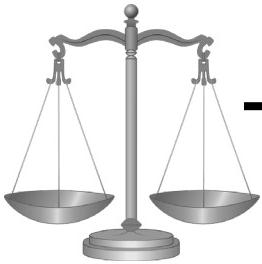


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**Via ECF:**

The Honorable Katharine H. Parker, U.S.M.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312

May 2, 2023

<b>USDC SDNY</b>
<b>DOCUMENT</b>
<b>ELECTRONICALLY FILED</b>
<b>DOC #:</b> _____
<b>DATE FILED:</b> 5/3/2023

Re: **Rivera v. Eastland Assoc Corp., et al.**  
Civil Docket No.: 22-cv-00707 (KHP)

Dear Judge Parker:

We represent Plaintiff Santos Rivera (“Plaintiff”) in this FLSA matter, and we respectfully submit this status report pursuant to Your Honor’s April 18, 2023 Order, and joint letter motion, together with counsel for the Defendants, to respectfully request an extension of time of thirty (30) days for the parties to file their proposed Settlement Agreement, and Motion for Court approval (“Settlement Submissions”).

As a preliminary matter, we sincerely apologize for not sooner filing these documents with the Court. We inadvertently overlooked the parties’ deadline by which the Court had directed the parties to do, and it has become apparent that the parties will require some additional time to do so, in chief, in light of scheduling conflicts with our respective clients necessary to procure these Settlement Submissions.

On November 21, 2022, the parties apprised the Court that they had reached a settlement-in-principle on all claims asserted herein. *See* Dkt. No. 41. Subsequently, on April 18, 2023, the Court ordered the parties to “write a joint status letter, updating the Court on the parties’ progress with finalizing a settlement agreement [b]y April 28, 2023.” *See* Dkt. No. 43.

As stated above, Defendants consent to this request for some additional time to do so, and this is the parties’ first such formal request on this matter. If this request is granted, the parties can file their above-referenced settlement submissions by June 2, 2023, and apologize for not doing filing sooner.

We thank the Court for its kind consideration on this matter, and we remain available to provide any additional information.

Respectfully submitted,

*Roman Avshalumov*  
Roman Avshalumov, Esq.

CC: counsel for the Defendants via ECF & Electronic Mail

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**APPLICATION GRANTED**

Katharine H. Parker  
**Hon. Katharine H. Parker, U.S.M.J.** 5/3/2023